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June 13, 2022

Via ECF

Honorable Vernon S. Broderick
United States District Court
40 Foley Square, Room 518
New York, New York 10007

APPLICATION GRANTED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 06/15/22

Re: *Cortes et al. v. DS Brooklyn Portfolio Owner LLC et al.*
Civil Action No. 20-cv-09619

Your Honor:

We represent the plaintiffs, Joaquin Cortes and Raul Mera (“Plaintiffs”), in the above-captioned matter, and submit this letter jointly with counsel for all defendants to respectfully request a brief extension of the parties’ deadline to submit a settlement agreement and letter motion seeking approval of the settlement agreement until June 17, 2022. This is the parties’ first request for an extension of the aforementioned deadline.

Pursuant to the Court’s Order dated May 11, 2022 (Dkt. No. 81) (the “Order”), the parties were required to submit a settlement agreement and letter motion to the Court on or before June 13, 2022. Since that time, counsel for the parties have worked in good faith to reduce the terms of the parties’ settlement to a formal written agreement, which has now been finalized. The parties respectfully request a brief extension, until June 17, 2022, to provide the parties with sufficient time to review and execute the agreement.

The parties apologize to the Court for the untimeliness of this request. Counsel for the parties have been engaged in prolonged negotiations over certain terms in the settlement agreement that the parties believed would be resolved in time to submit the agreement by today’s deadline. Now that the agreement has been finalized, the parties are confident that they will be able to submit the agreement and accompanying letter motion to the Court by this Friday.

We thank the Court for its consideration.

Respectfully submitted,


Adam Sackowitz